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8 Attorneys for Defendant Cheap Tech Guys LLC

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

11
12 MICROSOFT CORPORATION, a
13 Washington Corporation,

14 Plaintiff,

15 v.

16 CHEAP TECH GUYS LLC, a Nevada
17 Limited Liability Company,

18 Defendant.

Case No. 2:21-cv-00284-APG-VCF

19
20 **STIPULATION AND ORDER TO
EXTEND OPPOSITION DEADLINE TO
MICROSOFT CORPORATION'S
MOTION TO COMPEL DISCOVERY
RESPONSES FROM DEFENDANT
CHEAP TECH GUYS LLC**

21 **(First Request)**

22 Trial Date: None Set

23
24 IT IS HEREBY STIPULATED by and between Plaintiff, MICROSOFT CORPORATION
25 ("Plaintiff") by and through its counsel of record, the law firm of Greenberg Traurig, LLP, and
26 Defendant, CHEAP TECH GUYS LLC ("Defendant"), by and through its counsel, the law firm of
27 Wood, Smith, Henning & Berman, LLP, that the deadline to file an Opposition to Plaintiff's Motion
28 to Compel Discovery Responses currently due on March 11, 2022 be extended until April 11, 2022.

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1 As contemplated by LR IA 6-1. This extension is requested for good cause. The undersigned
2 counsel met and conferred and have agreed to an extension of time to allow the parties additional
3 time to set this matter for a mediation to see if this matter can resolve prior to expending Court
4 resources regarding the instant motion. The Plaintiff has previously extended a settlement demand,
5 which has started the settlement negotiation discussions. Additionally, the extension is sought to
6 avoid costs to the parties associated with litigating the instant motion including attorney's fees.

7 WHEREFORE, the aforementioned Parties, hereby agree, subject to the Court's approval,
8 that the deadline to file the Defendant's Opposition to Plaintiff's Motion to Compel Discovery
9 Responses be extended to April 11, 2022.

10 **IT IS SO STIPULATED.**

11 By /s/ Nicholas F. Adams
12 BROOKE A. BOHLKE
13 Nevada Bar No. 9374
14 ANALISE N.M. TILTON
15 Nevada Bar No. 13185
16 NICHOLAS F. ADAMS
17 Nevada Bar No. 14813
18 2881 Business Park Court, Ste. 200
19 Las Vegas, NV 89128-9020
20 *Attorneys for Defendant*

21 By /s/ Christopher R. Miltenberger
22 CHRISTOPHER R. MILTENBERGER
23 Nevada Bar No. 10153
24 10845 Griffith Peak Dr., Suite 600
25 Las Vegas, NV 89135
26 *Attorneys for Plaintiff*

27 Bonnie MacNaughton (*pro hac vice*)
28 Lindsey E. Mundt (*pro hac vice*)
29 DAVIS WRIGHT TREMAINE LLP
30 920 5th Avenue, Suite 3300
31 Seattle, WA 98104

32 **IT IS SO ORDERED.**



33 **UNITED STATES MAGISTRATE JUDGE**

34 3-14-2022

35 DATED: _____

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 11th day of March, 2022, a true and correct copy
3 of **STIPULATION AND ORDER TO EXTEND OPPOSITION DEADLINE TO**
4 **MICROSOFT CORPORATION'S MOTION TO COMPEL DISCOVERY RESPONSES**
5 **FROM DEFENDANT CHEAP TECH GUYS LLC (First Request)** was served via the United
6 States District Court CM/ECF system on all parties or persons requiring notice.

7 By /s/Jeanne L. Calix

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9 Jeanne L. Calix, an Employee of
10 WOOD, SMITH, HENNING & BERMAN LLP

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WOOD, SMITH, HENNING & BERMAN LLP
Attorneys at Law
2881 BUSINESS PARK COURT, SUITE 200
LAS VEGAS, NEVADA 89128-9020
TELEPHONE 702 251 4100 • FAX 702 251 5405

Jeanne Calix

From: miltenbergerc@gtlaw.com
Sent: Thursday, March 10, 2022 6:31 PM
To: Nick Adams; KellyGorton@dwt.com; BonnieMacNaughton@dwt.com
Cc: Jeanne Calix; Brooke A. Bohlke; Niki Shadoan; rosehill@gtlaw.com
Subject: [EXTERNAL] RE: Microsoft Corporation v. Cheap Tech Guys, LLC - Case No.: 2:21-cv-00284-APG-VCF

Nick,

You can use my e-signature on the stipulation to submit it.

Thanks,

Chris Miltenberger
Greenberg Traurig, LLP
702.599.8024

From: Nick Adams <NAdams@wshblaw.com>
Sent: Thursday, March 10, 2022 5:25 PM
To: Miltenberger, Chris (Shld-LV-LT) <miltenbergerc@gtlaw.com>; Gorton, Kelly <KellyGorton@dwt.com>; MacNaughton, Bonnie <BonnieMacNaughton@dwt.com>
Cc: Jeanne Calix <JCalix@wshblaw.com>; Brooke A. Bohlke <BBohlke@wshblaw.com>; Niki Shadoan <nshadoan@wshblaw.com>
Subject: Microsoft Corporation v. Cheap Tech Guys, LLC - Case No.: 2:21-cv-00284-APG-VCF

EXTERNAL TO GT

Hi all,

Attached is our proposed stipulation and order to extend the time to respond to the motion to compel. Please advise if I have your permission to use your e-signature so I can submit to the Court.

Thanks,



Nick Adams

Associate

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